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September 22, 1992

FAX: (202) 686-8282

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Re: ASF BROADCASTING CORP.,
Channel 280A, Westerville, Ohio

FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

SEP 22 '92

RECEIVED

Dear Ms. Searcy:

On behalf of ASF Broadcasting Corp., there are transmitted herewith an original and four (4) copies of its **Response to the Informal Objection** filed by WTTF, Inc.

Should additional information be necessary in connection with this matter, please communicate with this office.

Very truly yours,

SEP 23

RECI

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In Re Application of:)	
)	
ASF BROADCASTING CORP.)	File No. BPH-911230MB
)	
Application for Construction)	
Permit for a new FM station)	
Channel 280A, Westerville,)	
Ohio)	

TO: Mass Media Bureau

RESPONSE TO INFORMAL OBJECTION

ASF Broadcasting Corp. ("ASF"), by its attorneys, hereby responds to the Informal Objection filed September 11, 1992 by WTTF, Inc., as licensee of Radio Station WTTF, Tiffin, Ohio ("WTTF").

WTTF's complaint is that ASF's proposed facilities will be short-spaced by approximately 6.84 kilometers with WTTF's existing transmitter site. Of course, WTTF makes no mention of the the fact that ASF requested application processing under Section 76.215 of the rules which permits a certain amount of short-spacing, provided protection is given to the station or stations with which the proposal is short-spaced.

The sole support cited by WTTF is a single phrase, taken out of context, from the Commission's Memorandum Opinion and

Order in Amendment of Part 73 of the Commission's rules to Permit Short-Spaced Station Assignments by Using Directional Antennas, 6 FCC Rcd. 4356 (1991).

In that document, the Commission was disposing of various petitions for reconsideration. The portion quoted by WTTF involved a discussion of whether or not the Commission would entertain requests for waivers of Section 73.207 of the rules. One of the petitioners had argued that the Commission should continue to consider such waiver requests which would permit an applicant to be short-spaced without power reduction in the direction of the short-spaced station. The Commission declined to reinstate consideration of Section 73.207 waivers, pointing out that Section 73.215 would provide for site selection flexibility even in circumstances where waivers had been granted previously, i.e., where no fully-spaced sites are available.

As noted, WTTF has taken a single phrase out of context for its own purposes.

In light of the fact that the ASF application provides full protection to WTTF, the Informal Objection should be denied.

Respectfully submitted,

ASF BROADCASTING CORP.

By  _____

James A. Koerner
Its Attorney

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September 22, 1992

CERTIFICATE OF SERVICE

I, Jeanne E. Butler, a secretary in the law offices of Baraff, Koerner, Olender & Hochberg, P. C., do hereby certify that copies of the foregoing "**Response to Informal Objection**" were sent this 22nd day of September, 1992, via first class mail, postage prepaid to the following:

Dennis Williams, Chief*
FM Branch
Federal Communications Commission
1919 M Street, N. W., Room 332
Washington, D. C. 20554

John S. Neely, Esquire
Miller & Miller
P. O. Box 33003
Washington, D. C. 20033



Jeanne E. Butler

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